

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JOE DASILVA, JR.,

Plaintiff,

Case No: 2:20-cv-11358

Hon. Mark A. Goldsmith

Magistrate Judge Anthony P. Patti

v.

CHRISTINE WORMUTH,
Secretary of the Army, and
MARTIN POTTER, in his
individual capacity,

Defendants.

Keith Altman, Esq. (P81702)
The Law Office of Keith Altman
33228 West 12 Mile Road, Suite 375
Farmington Hills, MI 48331
(248) 987-8929
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**PLAINTIFF'S WITNESS LIST
AS OF SEPTEMBER 7, 2022**

As mandated by the Court's Scheduling Order (ECF 60), Plaintiff Joe DaSilva, Jr. ("Plaintiff") by and through counsel, the Law Office of Keith Altman, hereby states that the following witnesses may be called at trial:

1. Joe DaSilva, Jr.
2. Martin Potter, Assistant Chief, Detroit Arsenal Fire Department

3. Christine Wormuth, Secretary of the Army
4. Sean Edwards, Fire Chief, Detroit Arsenal Fire Department
5. Joseph Moscone, Department of the Army, Installation Management Command, United States Army Garrison-Detroit Arsenal
6. Arthur J. Young, Jr., Director, Emergency Service for the United States Army.
7. Robert G. Porter, Director of Human Resources, Installation Management Command, United States Army Garrison-Detroit Arsenal
8. Matt Hoiltyn, Detroit Arsenal Fire Department
9. Matt Kumlin, Detroit Arsenal Fire Department
10. David Ferris, Detroit Arsenal Fire Department
11. Mike Fern, Detroit Arsenal Fire Department
12. Bruce Kubiny, Detroit Arsenal Fire Department
13. Matt Scibilia, Detroit Arsenal Fire Department
14. Lesley Tillman, Detroit Arsenal Fire Department
15. Scott Magowan, Detroit Arsenal Fire Department

16. Steve Ashwell, Detroit Arsenal Fire Department

17. Any and all EEOC/EEO Directors, Counselors, Mediators, and/or Investigators involved in the investigation(s) regarding the subject harassment.

18. Any and all Sexual Assault Response Coordinators (SARC) that were assigned to investigate this incident by the United States Army.

19. Any and all employees or agents of the United States Army that were witness to and/or with direct knowledge of or involvement in the subject incident(s) and/or investigation(s) that followed as a result.

20. Any and all members of the SHARP Screening Team that met and discussed the subject incident(s) of sexual harassment.

21. All fact witnesses who have factual knowledge of: facts alleged in Plaintiff's Complaint, discovery responses, documents produced, depositions, sworn statements, subpoenaed documents, affirmative defenses, defenses asserted by Defendants, and oral or written testimony or facts asserted at trial. Witnesses are unknown to Plaintiff at this time.

22. Any person listed on Defendants' witness lists and/or Fed. R. Civ. P. 26(a)(1) Initial Disclosures.

23. Any rebuttal witnesses, as necessary.

24. All persons or entities referred to in depositions, interrogatories, answers to interrogatories, or requests for documents in this action.

25. All witnesses that future discovery may identify.

Discovery and fact investigation remain ongoing in this action. Plaintiff does not plan on calling any Expert Witnesses at this time. Plaintiff reserves the right to name additional witnesses as their identities, the subject of their knowledge, or the relevance of such knowledge become known. If it appears that additional witnesses will or may be called to testify at trial, Plaintiff will report their names to Defendants. This restriction does not apply to rebuttal witnesses.

Dated: September 7, 2022

Respectfully submitted,

THE LAW OFFICE OF KEITH ALTMAN

By: /s/ Keith Altman
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Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I certify that on September 7, 2022, I served the foregoing Plaintiff Joe DaSilva Jr.'s Witness List upon all parties herein by filing copies of same using the Court's ECF Filing System.

By: /s/ Keith Altman
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